

REMARKS

The Office examined claims 1-13 and rejected 1, 2, 4, 6-11 and 13. This paper requests reconsideration.

Rejections under 35 USC §103

At page 2 of the Office action, claims 1, 2, 4, 6-11 and 13 are rejected under 35 USC §103 as being unpatentable over US-2004/0029080 (Healy) in view of US-2005/0068169 (Copley).

The independent claims are apparatus claim 1 and method claim 11. These recite a ranging receiver using sensor signals provided by a motion sensor mechanically coupled to the ranging receiver; and the ranging receiver powering down selected components based on whether the sensor signals indicate only at most insubstantial motion of the ranging receiver.

Regarding claim 1: The Office asserts that Healy discloses the invention as in claim 1, except that Healy fails to disclose a mechanical coupling of a motion sensor to a ranging receiver. The Office points to par. [0085] of Healy for a teaching of a ranging receiver including a motion sensor. The Office relies on Copley, in the abstract, for a teaching of the recited mechanical coupling.

Applicant has argued that there is no motivation for changing the system disclosed by Healy so as have the motion sensor 80 mechanically coupled to the GPS receiver 84, based on the observation by applicant that the motion sensor 80 of Healy is used not only in providing signals to the processor 58 to power up the GPS receiver 84, but also in providing signals to non-maskable interrupt (NMI) logic circuit 62, which powers up the processor 58. In response, the Examiner has argued that even so, the motion sensor of Healy is used for powering down the GPS receiver of Healy, and further, notes that "applicant doesn't give a reason in his specification why the coupling to the

ranging has to be a mechanical coupling." Applicant respectfully submits that it is clear from the application throughout that the coupling must be a mechanical coupling (as opposed to a purely electrical or communicative coupling) because the motion sensor is being used in the invention to determine if the ranging receiver is moving. Thus, the motion sensor must move when the ranging receiver moves, which is ensured only by a mechanical coupling of the two.

Now in Healy, to power up the GPS receiver the processor must be powered up because it sends the power up signal to the GPS receiver. Thus, the motion sensor 80 of Healy should be mechanically coupled to the processor 58, as implied by Fig. 8A, and need not be so coupled to the GPS receiver. Fig. 8A shows a direct coupling between the motion sensor 80 and the processor 58, but only an indirect coupling of the motion sensor 80 to the GPS receiver 84.

Regarding claim 2: If the ranging receiver is sensed to be substantially stationary by the motion sensor, selected components of the ranging receiver are powered down, according to the invention as in rejected claim 2. In case of Healy, on the other hand, a ranging receiver (GPS) is turned off automatically, i.e. regardless of the ranging information it provides, as soon as it provides its ranging information (to a processor 58), and then turned back on only when the motion sensor detects significant motion. Healy thus discloses the opposite of what is recited in claim 2, and the end result will likely be that a system according to Healy would cycle (power off and then power back on) a ranging receiver more than a system according to the invention, with a consequent loss of ranging information.

Regarding claim 11: the same arguments made in respect to claim 1 apply to the rejection of claim 11. Further, as noted in respect to claim 2, claim 11 recites powering down selected

components of the ranging receiver based on whether the sensor signals indicate only at most insubstantial motion of the ranging receiver, whereas Healy teaches automatically powering down the ranging receiver as soon as it provides its ranging information, without regard to any sensed motion.

Request for reconsideration: Accordingly, in view of the above arguments and in view of the dependencies of the claims not argued, applicant respectfully requests that the rejections under 35 USC §103 be reconsidered and withdrawn.

Conclusion

For all the foregoing reasons it is believed that all of the claims of the application are in condition for allowance and their passage to issue is earnestly solicited. Applicant's attorney urges the Examiner to call to discuss the present response if anything in the present response is unclear or unpersuasive.

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Date

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